

Norman Trabulus
345 SEVENTH AVENUE
21ST FLOOR
NEW YORK, NEW YORK 10001
(212) 221-7811 telephone
(212) 398-8835 telefacsimile

Member, NY Bar

email: ntrabulus@gmail.com

September 16, 2015

Hon. Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **United States v. Ornedys Giron CR 08-270 (NGG)**

Your Honor:

I represented the defendant through his sentencing. He is still on supervised release and informs me he once again needs to present his U.S. passport to the New York State Department of Motor Vehicles to complete the process of acquiring a commercial driver's license. He informs me that Pretrial Services is still holding that passport, though he is now, of course, is being supervised by the Probation Department, not Pretrial Services. He informs me that Pretrial Services has told him it once again needs a letter from your Honor before it will temporarily release his passport to him. I wrote such a letter once before, and your Honor so-ordered it in late May of this year.

I therefore respectfully request that the Court so-order this letter and thereby authorize and direct Pretrial Services to release Mr. Giron's passport to him temporarily for a reasonable period sufficient for him to apply for a New York State Commercial Driver's license and to return it to Pretrial Services thereafter.

Respectfully submitted,

/S/

Norman Trabulus